

# EXHIBIT A

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Bruce Dubinsky – March 29, 2022

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CASE NO. 18-MD-2865 (LAK)

\_\_\_\_\_)  
IN RE: )  
 )  
CUSTOMS AND TAX ADMINISTRATION OF )  
THE KINGDOM OF DENMARK )  
(SKATTEFORVALTNINGEN) TAX REFUND )  
SCHEME LITIGATION )  
\_\_\_\_\_)

C O N F I D E N T I A L

REMOTE VTC VIDEOTAPED EXPERT DEPOSITION UNDER ORAL  
EXAMINATION OF  
BRUCE DUBINSKY

DATE: March 29, 2022

REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 this case, are you?

2 A No, I'm not.

3 Q And you're also not offering an  
4 opinion about whether SKAT reasonably relied  
5 on the reclaim applications at issue in the  
6 case.

7 Right?

8 A That is correct. I am not.

9 Q Okay. Mr. Dubinsky, have you ever  
10 worked as a trader?

11 A I have not worked as a trader, no.

12 Q So you don't have any experience in  
13 trading Danish securities.

14 Is that a fair statement?

15 A I would agree with you, yes.

16 Q Have you ever engaged in dividend  
17 arbitrage trading?

18 A I have not.

19 Q Do you have any experience in  
20 arranging structured transactions?

21 MR. WEINSTEIN: Objection to form.

22 A I have not. I'm just trying to  
23 think.

24 I have not been involved in  
25 arranging structured transactions.

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1 But you recall that, I take it?

2 A Yes.

3 Q Okay. Those trades involved shares  
4 in Danish companies.

5 Right?

6 A They were -- I classified those as  
7 purported transactions and purported shares  
8 of Danish companies. That would be the way  
9 that I would classify them.

10 Q Okay. In your report, you reviewed  
11 such trades in shares of Carlsberg.

12 Right?

13 A Correct.

14 Q And also such trades in Novo  
15 Nordisk.

16 Correct?

17 A Yes.

18 Q And also you reviewed such trades  
19 in AP Moeller-Maersk.

20 Right?

21 A Correct.

22 Q Okay. And those are real  
23 companies.

24 Right?

25 A That is correct, yes.